

# Exhibit B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>JOSE OLVERA</b>	§	
<b>AND ALL OTHERS</b>	§	
<b>SIMILARLY SITUATED,</b>	§	
Plaintiffs,	§	
<b>v.</b>	§	<b>CIVIL ACTION</b>
	§	<b>4:13-cv-00975</b>
	§	
	§	
<b>UTILIMAP CORPORATION,</b>	§	
<b>QUANTA SERVICES MANAGEMENT</b>	§	
<b>PARTNERSHIP, L.P. and</b>	§	
<b>QUANTA SERVICES, INC.</b>	§	
Defendants	§	

**DECLARATION OF RAMIRO DOMINGUEZ PURSUANT TO 28 USC § 1746**

My name is Ramiro Dominguez. I was employed by the Utilimap Corporation and later by a company called Quanta Services as a Laborer in its Ground Line Treatment Division from July 2010 through September 2011.

During my work at Utilimap Corporation, I worked in excess of 40 hours every work week. During my work for Utilimap Corporation, I never received any overtime pay from the Company for the work I performed in excess of 40 hours in a workweek. My hourly pay when I worked for Utilimap Corporation was \$10.00 per hour.

During my period of employment with Utilimap Corporation I worked in Missouri, Ohio, and Pennsylvania, on various projects. I think I was told the name of some of the projects but I cannot remember the names.

When I was hired by Utilimap Corporation I was told the foreman would write down the hours that I worked. I would be required to sign the form my foreman filled out, and that form was then used by Utilimap to pay me. I was told this was way all of us were to be paid. I had two different foreman while I worked for the company. My first foreman was named Martin but I did not know his last name. My second foreman was named Eduardo but I did not know his last name. Martin and Eduardo gave me the forms I was required to sign. Sometimes the forms had writing on them and sometimes they were blank. I wanted to get paid so I always signed the document.

Many of us talked among ourselves when we compared our paychecks that we weren't receiving overtime pay. I know that the workers classified as Laborers were treated in the same way by Utilimap Corporation, because I saw the paychecks of those workers, and none of us ever received any overtime payments.

I was told by some other employees that the company was changing. I think this was near the end of 2011. Some people were given raises but I did not receive a raise. A lot of other employees like myself were let go. I was let go in September 2011. I was never not told why.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this \_\_\_\_ day of November 2013.

Signature \_\_\_\_\_  
**Ramiro Dominguez**



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### CERTIFICATE OF TRANSLATION

The undersigned hereby certifies under penalty of perjury that she is a professional translator of the English and Spanish languages and is fully conversant with said languages.

That on or about the 8<sup>th</sup> day of November, 2013, she made the attached Spanish-language translations of the statement of Ramiro Dominguez attached hereto.

That to the best of her knowledge and belief, said translation is a true, complete and accurate English translation of the original document in Spanish.

That her professional qualifications are as follows: University studies in both languages; practice of the translation profession since 1964; certification for translation from Spanish into English and English into Spanish, granted to her by the American Translators Association after her successful completion of qualifying examinations; certification for interpreting Spanish into English and English into Spanish by the Administrative Office of the United States Courts after her successful completion of a series of qualifying examinations.

In witness whereof, I have signed my name on this the 8<sup>th</sup> day of November, two thousand thirteen in the City of Houston, State of Texas.

Ana María Paredes

U. S. Federal Certified Court Interpreter (Certificate No. 98-079)

ATA Certified Translator #218005

Texas Licensed Court Interpreter #167



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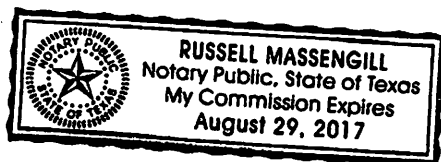
American Translators Association

Houston Interpreters and Translators Association

Texas Association of Judiciary Interpreters and Translators

On this 8<sup>th</sup> day of November, 2013, before me personally appeared Ana Maria Paredes to me known to be the person who executed the foregoing instrument and acknowledge that she executed the same as her free act and deed.

Subscribed and sworn before me on this 8 day of November, 2013.



Notary



Muchos de nosotros platicábamos cuando comparábamos nuestros cheques de pago que no estábamos recibiendo pagos por horas extras. Sé que los trabajadores clasificados como obreros fueron tratados de la misma forma por Utilimap Corporation, porque vi los cheques de esos trabajadores y ninguno de nosotros recibió pago de horas extras.

Me dijeron algunos empleados que la compañía estaba cambiando. Creo que eso sucedió a finales del 2011. Algunos empleados recibieron aumento de sueldo, pero yo no. A muchos otros empleados como yo los despidieron. A mí me despidieron en septiembre del 2011 y nunca me dijeron por qué.

Declaro bajo pena de perjurio que lo anterior es verdadero y correcto.

Firmado este día 13 de noviembre de 2013.

Firma RAMIRO DOMINGUEZ LARZA  
Ramiro Dominguez